

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

H-D U.S.A., LLC,)
Plaintiff,) Case No. 17-cv-04341
v.)
ZHIYASM2016, et al.,)
Defendants.)

Judge Thomas M. Durkin
Magistrate Judge Young B. Kim

Declaration of Justin R. Gaudio

I, Justin R. Gaudio, of the City of Chicago, in the State of Illinois, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff H-D U.S.A., LLC (“Harley-Davidson” or “Plaintiff”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:
2. Since and pursuant to entry of the TRO, dozens of PayPal accounts associated with the Defendant Internet Stores have been frozen.
3. **Exhibit 1** attached hereto is a true and correct copy of unpublished decisions cited in Harley-Davidson’s Memorandum.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this the 26th day of June 2017 at Chicago, Illinois.

/s/ Justin R. Gaudio
Justin R. Gaudio
Counsel for Plaintiff H-D U.S.A., LLC